



429 Fourth Avenue
Law & Finance Building, 13th Floor
Pittsburgh, PA 15219
T: 412.281.8400
F: 412.281.1007

29 Broadway, 24th Floor
New York, NY 10006-3205
T: 212.952.0014
www.fdpklaw.com

Writer's Email:
jkravec@fdpklaw.com

via ECF

Honorable Philip M. Halpern
United States District Court
Southern District of New York
300 Quarropas Street, Room 530
White Plains, NY 10601-4150

Application to seal unredacted letter and exhibits (Doc. 77) granted.

SO ORDERED.

A handwritten signature in black ink, appearing to be 'PHM', written over a horizontal line.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
August 27, 2021

**Re: *Vozzolo v. Air Canada*, Case No. 7:20-cv-03503
Abskharon/Winograd v. Air Canada, Case No. 7:20-cv-11037
Piercy v. Air Canada, Case No. 1:20-cv-04988**

Dear Judge Halpern:

We write to move for sealing of certain filings on behalf of Plaintiffs Vozzolo, Winograd and Piercy pursuant to Rule 5 of Your Honor's Individual Practices in Civil Cases. Plaintiffs wish to submit a letter and two exhibits to Your Honor concerning our position on the continued viability of putative class members' claims in light of the results of Defendant Air Canada's so-called "COVID-19 Goodwill Refund Period" offer. The two exhibits, discussed in our letter, were designated "Confidential Subject to Protective Order" by Defendant. Plaintiffs have conferred with Defendant and agreed to seek to seal the two exhibits that Defendant asserts contains confidential proprietary information and to redact references thereto from their letter. In accordance with Your Honor's Rule 5, a redacted version of our letter is publicly filed herewith, and an unredacted version highlighted to show the proposed redactions together with the exhibits to be sealed is filed herewith under provisional seal pending a ruling on this letter motion.

Accordingly, Plaintiffs request Your Honor's approval of filing under seal these two exhibits designated confidential by Defendant and the redaction from our letter of the highlighted

Honorable Philip M. Halpern

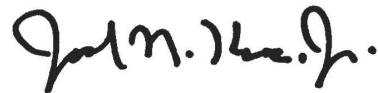
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portions that discuss information contained in those confidential exhibits. Defendant advises that it does not oppose this request.

Thank you for your attention to this matter. If the Court has any questions, we are available at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "J.N. Kravec, Jr.", with a stylized flourish at the end.

Joseph N. Kravec, Jr.
Admitted in NY and PA

JNK,JR./mzc

cc: All Counsel of Record (via ECF)